

**Katten**

50 Rockefeller Plaza  
New York, NY 10020-1605  
+1.212.940.8800 tel  
katten.com

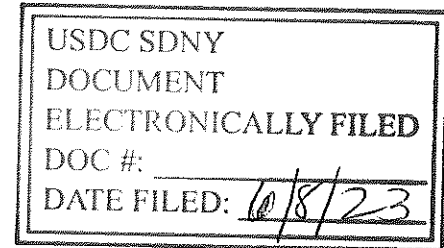
**MEMO ENDORSED**

SCOTT A. RESNIK  
scott.resnik@katten.com  
+1.212.940.8543 direct  
+1.212.894.5513 fax

June 7, 2023

**VIA ECF**

United States Magistrate Judge  
Southern District of New York  
300 Quarropas Street  
White Plains, NY 10601-4150



**Re: *United States v. Onekey, LLC, et. al.*, No. 7:22-cr-00414-PED**

Your Honor:

This firm represents Defendants Onekey, LLC and Finbar O'Neill in the above-captioned case. On February 2, 2023, Mr. O'Neill pleaded guilty to violating 29 U.S.C. § 666(e) and was thereafter sentenced to a term of three months imprisonment by Judge Paul E. Davison (Ret.) on May 12, 2023. He is currently scheduled to begin his sentence of imprisonment on July 24, 2023. We write to request a brief one-month adjournment of Mr. O'Neill's surrender date, until August 28, 2023.

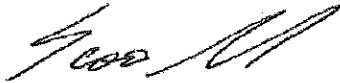
Mr. O'Neill is the operations manager at Onekey, LLC ("Onekey"), a general contracting company (and the co-Defendant in this case). In this role, Mr. O'Neill manages the day-to-day operations of Onekey, whose projects employ hundreds of workers. Currently, two of Onekey's biggest development projects are set to close in early August, but for this to occur each project must pass inspection and obtain certificates of occupancy ("COO"). Mr. O'Neill is the individual at the company with the most experience with these projects, making his participation in the inspection and COO process critical. If he is unable to oversee the closings of these projects, there is an increased likelihood that the projects will not pass inspection or obtain the necessary COO. Such failures would prevent the projects from closing on time which could cause Onekey to default on the terms of its construction loans. Should this occur, the financial consequences to Onekey and its employees would be substantial. As a result, to enable Mr. O'Neill to oversee the closing of these two projects, we request that Mr. O'Neill's surrender date be adjourned from July 24, 2023 to August 28, 2023.

On May 31, 2023, this request was discussed with the government and the government has no objections to the requested adjournment.

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Respectfully submitted,



Scott A. Resnik

**APPLICATION GRANTED**



Hon. Victoria Reznik, U.S.M.J.